

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*

2 Sophia S. Lau, Esq., Nevada Bar No. 13365
3 *slau@earlysullivan.com*

3 EARLY SULLIVAN WRIGHT
4 GIZER & McRAE LLP

4 8716 Spanish Ridge Avenue, Suite 105
5 Las Vegas, Nevada 89148

5 Telephone: (702) 331-7593
6 Facsimile: (702) 331-1652

7 Kevin S. Sinclair, NV Bar No. 12277

8 *ksinclair@sinclairbraun.com*

9 SINCLAIR BRAUN LLP
10 16501 Ventura Blvd, Suite 400
11 Encino, California 91436
12 Telephone: (213) 429-6100
13 Facsimile: (213) 429-6101

14 Attorneys for Defendants

15 CHICAGO TITLE INSURANCE COMPANY, and TICOR
16 TITLE OF NEVADA, INC.

17 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
18 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

19 Gary L. Compton, State Bar No. 1652
20 2950 E. Flamingo Road, Suite L
21 Las Vegas, Nevada 89121

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 HSBC BANK USA, N.A.,

Case No.: 2:21-CV-01300-APG-NJK

19 Plaintiff,

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

20 vs.

FIRST REQUEST

21 FIDELITY NATIONAL TITLE GROUP,
22 INC. et al.,

23 Defendants.

24 COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and Ticor
25 Title of Nevada, Inc. (“Ticor Agency”) (collectively “Defendants”) and plaintiff HSBC Bank
26 USA, National Association (“HSBC”), by and through their respective attorneys of record, which
27 hereby agree and stipulate as follows:

1 1. On July 8, 2021 HSBC filed its complaint in the Eighth Judicial District Court for
2 the State of Nevada;

3 2. On July 8, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Ticor Agency's response to HSBC's complaint is currently due on August 11, 2021, while Chicago Title's response to HSBC's complaint is currently due on August 12, 2021;

6 4. Counsel for Defendants request a 30-day extension for Ticor Agency (29 days for
7 Chicago Title), through and including Friday, September 10, 2021, for Defendants to file their
8 respective responses to HSBC's complaint to afford Defendants' counsel additional time to
9 review and respond to HSBC's complaint.

10 5. Counsel for HSBC does not oppose the requested extension;

11 6. This is the first request for an extension made by counsel for Defendants, which is
12 made in good faith and not for the purposes of delay.

13 7. This stipulation is entered into without waiving any of Defendants' objections
14 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint is hereby extended through and including Friday, September 10, 2021.

3 Dated: August 10, 2021

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
CHICAGO TITLE INSURANCE COMPANY
and TICOR TITLE OF NEVADA, INC.

8 Dated: August 10, 2021

WRIGHT FINLAY & ZAK, LLP

10 By: /s/-Christina v. Miller

11 CHRISTINA V. MILLER
12 Attorneys for Plaintiff
HSBC BANK USA, NATIONAL
ASSOCIATION

13 **IT IS SO ORDERED.**

14 Dated: August 11, 2021

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16 NANCY J. KOPPE
17 UNITED STATES MAGISTRATE JUDGE